

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JEFFREY WORTH AND ROBERT BURNS,
on behalf of themselves and others similarly
situated,

Plaintiffs,

v.

CVS PHARMACY, INC.,

Defendant.

No. 16-cv-00498-MDG

**DECLARATION OF
STEVEN A. SKALET ON BEHALF OF
MEHRI & SKALET PLLC IN SUPPORT
OF MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT
AND MOTION FOR PAYMENT OF
CLASS COUNSEL FEES, EXPENSES
AND PAYMENT OF INCENTIVE
AWARD TO THE CLASS
REPRESENTATIVES**

I, Steven A. Skalet, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a founder and principal of Mehri & Skalet, PLLC, (“M&S”), a leading national law firm that specializes in complex and class action litigation on behalf of plaintiffs in federal and state courts. I am competent, over the age of majority, and except as otherwise noted this declaration is based on my personal knowledge.

2. M&S and the undersigned have been lead or co-lead counsel in many successful consumer, employment and civil rights case at both the state and federal level. I graduated from the University of Pennsylvania School of Law in 1971 and have been in practice as an active attorney and litigator for over 45 years. Most of M&S’s work on the case was performed by Craig L. Briskin and me. Mr. Briskin graduated from Harvard Law School in 1998 and is also an experienced class action and consumer attorney who has been lead or co-lead counsel in numerous state and federal cases.

3. More information about M&S and the attorneys who worked on the case were submitted in connection with Plaintiffs’ Motion for Preliminary Approval and can also be found at FindJustice.com.

4. I submit this declaration in support of the motion by Jeffrey Worth and Robert Burns for Final Approval of the Class Action Settlement and the accompanying motion for payment of Class Counsel fees and expenses as well as incentive awards. Based on my experience and knowledge of this case it is my opinion that the proposed settlement is fair and reasonable and in the best interest of the Plaintiff Class.

5. The companion Declaration of Michael Reese sets forth the history of the litigation and describes the representation.

6. M&S has accrued \$17,764.41 in expenses to date, of which \$1,209.50 is for

electronic research. M&S's Lodestar for time spent on the case to date at its current rates is \$649,562.00. M&S's rates are consistent with rates charged by comparable attorneys doing similarly complex work in Washington D.C. and are consistent with Adjusted Laffey rates that have been frequently approved by federal courts for District of Columbia attorneys.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: September 5, 2019

Mehri & Skalet, PLLC

/s/ Steven A. Skalet

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